

EXHIBIT 31

US District Court - Delaware
Chapter 11 - W.R. Grace

FINAL - October 22, 2007
Steve Hays

Page 1

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

CHAPTER 11

IN RE:

W.R. GRACE & CO., et al.,

Debtors.

Case No. 01-1139 (JFK)

DEPOSITION OF:

Steve Hays

Monday, October 22, 2007

Washington, D.C.

Lead: Scott A. McMillin, Esquire

Firm: Kirkland & Ellis LLP

FINAL COPY

JANE ROSE REPORTING 1-800-825-3341

JANE ROSE REPORTING
1-800-825-3341 janerosereporting.com

US District Court - Delaware
Chapter 11 - W.R. Grace

FINAL - October 22, 2007
Steve Hays

Page 298

1 the semicolon?

2 **Q Yes.**

3 **A** If there is no scientific
4 method to measure risk quantitatively from
5 the indirect method, I don't think you ever
6 measure risk. You estimate risk anyway.
7 So if you are talking about historical
8 epidemiology data, we have already had the
9 discussion that that is -- those curves are
10 based on direct method.

11 So an indirect method I have
12 already opined on, how -- what that would
13 mean or not mean in terms of a data set.

14 So if we are talking about the
15 indirect method for dust, then I agree that
16 I can't take a settled dust number,
17 prepared direct or indirect, for that
18 matter, and convert that into an airborne
19 exposure that would be used to compare to
20 the PCM data.

21 **Q So is that a long way of saying**
22 **that, using the indirect preparation**